## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ANTHONY MAYS, Individually and on behalf	)
of a class of similarly situated persons; and	)
JUDIA JACKSON, as next friend of KENNETH	)
FOSTER, Individually and on behalf of a class	)
of similarly situated persons,	)
Plaintiffs-Petitioners,	) ) Case No. 1:20-cv-2134
v.	, )
THOMAS DART, Sheriff of Cook County,	)
Defendant-Respondent.	)

## **DECLARATION OF STPEHEN H. WEIL**

- I, Stephen H. Weil, counsel for the Plaintiffs in the above-captioned case, state that the following is true and correct to the best of my knowledge:
- 1. I am an attorney with the law firm of Loevy & Loevy in Chicago. I submit this declaration in support of the Plaintiffs' motion for class certification.
- 2. Loevy & Loevy regularly engages in complex litigation, including complex class actions, many of which raise claims under 42 U.S.C. § 1983 for violations of constitutional rights. Loevy & Loevy has the resources and experience necessary to conduct litigation of this nature, and has experience prosecuting class actions of similar size, scope, and complexity to this case.
- 3. Attorneys at Loevy & Loevy have been appointed numerous times as class counsel, including in Marconi v. City of Joliet, Case No. 10-MR-0165 (Circuit of Will

County, Ill.) (class action alleging violations of collective bargaining agreement and the Illinois Constitution brought by employees of the City of Joliet); Aranda v. Carribbean Cruise Line, No. 12 C 4096 (N.D. Ill.) (class action alleging violations of the TCPA by consumers); Dobbey v. Jeffreys, No. 13 C 1068 (N.D. Ill.) (class action seeking injunctive relief to remedy unconstitutional conditions of confinement at Stateville Correctional Center); Dunn v. City of Chicago, No. 04 C 6804 (N.D. Ill.) (class action alleging unconstitutional treatment of detainees in Chicago Police Department lockups); Flood v. Dominguez, No. 08 C 0153 (N.D. Ind.) (class action alleging unconstitutional conditions at the Lake County Jail); Solon v. Midwest Medical Records Association, No. 04-CH-7119 (Cook Cnty. Cir. Ct.) (consumer class action); Ross v. Gossett, No. 15 C 0309 (S.D. Ill.) (class action alleging unconstitutional shakedown procedures at four downstate Illinois prisons); Throgmorton v. Reynolds, No. 12 C 3087 (C.D. Ill.) (class action alleging unconstitutional strip search at Lincoln Correctional Center); Young v. County of Cook, No. 06 C 0552 (N.D. Ill.) (class action alleging unconstitutional strip search of detainees at Cook County Jail).

- 4. I have been an attorney for 15 years, and practicing as a civil rights litigator focused on the criminal legal system since 2014.
  - 5. I am a member in good standing of the bar of State of Illinois.
- 6. Loevy & Loevy has sufficient funds available to finance the costs of this litigation, and the ongoing monitoring required to protect the interests of the class.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Stephen H. Weil

Date: April 3, 2020 \_\_\_\_\_

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